

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

CHARLENE P. LEON, individually, and as a
representative of a Class of Participants and
Beneficiaries of the Maersk Inc. Savings Plan,

Plaintiff,

v.

MAERSK INC, THE BOARD OF DIRECTORS OF
MAERSK INC., and THE PENSION COMMITTEE
OF MAERSK INC.,

Defendants.

CASE No. 3:23-cv-00602-RJC-SCR

**PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS, ADMINISTRATIVE
EXPENSES, AND A CASE CONTRIBUTION AWARD**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on December 2, 2024 at 10:00 am., at 10:00 AM in Courtroom #4A, 401 W Trade St, Charlotte, NC 28202, Plaintiff Charlene P. Leon ("Plaintiff") will and hereby does move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$75,000 (one-third of the \$225,000.00 Gross Settlement Amount); (2) reimbursement of \$25,615.19 in litigation costs; (3) \$39,732.00 in settlement administration expenses (including \$15,000 to the independent fiduciary); and (3) a case contribution award in the amount of \$5,000 for the Class Representative.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Paragraph 3.2 of the Parties' Class Action Settlement Agreement (Dkt. 21-1) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M. Secunda, the

previously filed declaration of the Class Representative (Dkt. 22), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiff has conferred with counsel for Defendants regarding this motion and have been advised that Defendants take no position directly or indirectly on Class Counsel's application for attorneys' fees and expenses. As of the filing of this motion, there also have been no objections to the Settlement or the proposed attorney fees and other expenses in that Notice.

Dated this 1st day of November, 2024

WALCHESKE & LUZI, LLC

s/ Paul M. Secunda*

**admitted pro hac vice*

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*ATTORNEYS FOR PLAINTIFF and
PROPOSED SETTLEMENT CLASS*

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2024, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/Paul M. Secunda
Paul M. Secunda